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A Methodology for Updating the City Carrier Regular Delivery Variabilities*

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A. Introduction

The Postal Service calculates unit delivery costs by rate category to provide insight into the nature of those costs at a detailed level. For FY 2019, unit delivery costs were calculated in the Unit Delivery Cost model (UDCModel19.xlsx) and presented in Table 1, in the preface to USPS-FY19-19.[1] Additionally, the unit delivery costs for relevant products are disaggregated into separate costs for flats delivered in FSS zones and flats delivered in non-FSS zones. These costs are calculated in the FSS Delivery Cost model (FSSDeliveryModel.xlsx).[2] These even more detailed costs are presented in Table 2 in the same preface.

The delivery cost models include further disaggregation of delivery costs into their rural carrier and city carrier components, and for city carriers, costs are separately calculated for office time and street time. Consequently, using the FSS Delivery Cost model, it is possible to compare just the city carrier street time costs for flats delivered in FSS and non-FSS zones. These calculated unit street time costs from the FSS model are reproduced in Table 1, below. Review of that table reveals that there are large differences between the street time delivery costs for flats in FSS and non-FSS zones. For example, the unit street time delivery cost for FSS Periodicals flats, at 10.69 cents, is 3.38 times as large as the 3.16 cent unit street time delivery cost for Periodicals flats delivered in non-FSS zones.

[1] *See*, USPS-FY19-19, Docket No. ACR2019, December 27, 2019.

[2] *Id.*

Table 1

City Carrier Street Unit Costs

Class, Shape, or Rate Category	Destinating FSS Zones	Destinating Non-FSS Zones
Periodicals Flats	0.1069	0.0316
Bound Printed Matter Flats	0.0764	0.0453
USPS Marketing Mail Flats	0.1105	0.0325
Carrier Route Flats	0.1072	0.0382

This gap in unit costs is surprising because such a gap does not exist for the marginal delivery times on which the costs are based. In the established city carrier cost model, the marginal delivery time for an FSS piece (5.2 seconds) is just 1.86 times the marginal time for a cased piece (2.8 seconds).[3]

This discrepancy raises the question of why the gap in unit street costs for FSS mail and non-FSS mail costs arises. Investigation into the source of the gap revealed it has arisen because of a mismatch between attributable street time costs and the corresponding volumes. Specifically, the ratio of attributable costs for FSS and non-FSS flats does not match the corresponding ratios of volumes. FSS Marketing Mail Flats, for example, represent 17.1 percent of all Marketing Mail Flats, but receive 40.7 percent of overall Marketing Mail Flats' city carrier delivery time cost. Further investigation of this discrepancy between relative costs and volumes uncovered its source -- the volume proportions from the City Carrier Street Time Study (CCSTS) data,

[3] *See*, City Carrier Street Time Report (December 11, 2014), Docket No. RM2015-7, at 79

collected in FY 2013 and used in the established model, do not match the current volume proportions.

Table 2 presents the proportions of the letter and flat mail delivered on city carrier routes from the 2013 City Carrier Street Time Study.[4] These volume proportions are used to calculate the current variabilities. Table 2 also presents the proportions of letter and flat mail delivered on city routes based upon the FY 2019 City Carrier Cost System (CCCS) data.[5]

Table 2

CCSTS and FY 2019 CCCS Proportions of Letter and Flat Mail by Type of Mail

Variable	**CCSTS FY13 Proportions**	**CCCS FY19 Proportions**
DPS	65.0%	70.5%
Cased	20.1%	20.0%
Sequenced	10.4%	6.7%
FSS	4.5%	2.8%

The FY 2019 volume proportions are noticeably different from the study proportions, with the FY 2019 data showing an increase in the DPS mail proportion and declines in both the sequenced mail and FSS mail proportions. This shift has implications for calculated unit delivery costs, because the city carrier street time

[4] *Id.* at 53.

[5] USPS-FY19-NP14, B Workpapers, CS06&7-NP-FY19.xlsx, Tab 7.0.8.

variabilities depend upon the volumes used to calculate them. As shown below, there is a direct relationship between a mail type's volume and its corresponding variability. Not accounting for volume changes can lead to the calculation of inappropriate variabilities. If a particular type of mail's relative volume has declined and the current variability calculation does not account for that decline, then its volume variable cost will be higher than it should be, leading to high calculated unit costs.

This issue is particularly important for city carrier street time, because the estimated variabilities determine the size of the activity cost pools. In some cost segments, like purchased transportation, the sizes of the activity cost pools are determined by recorded costs, and the associated variability determines how much of that cost pool is attributable to products. Individual activity cost pools can be constructed because costs are recorded at a detailed level, like account category. In contrast, city carrier street time is recorded in broad activity groups with the time for all letter and flat deliveries in a single accrued regular delivery time cost pool. Thus, the individual activity cost pools, like delivery of DPS or FSS mail, are constructed by multiplying the accrued regular delivery time cost by the relevant variabilities. Updating the variabilities to reflect the current relative volumes thus has the effect of updating the relevant activity cost pools.

In Docket No. RM2017-8, the Postal Service proposed, and the Commission accepted, a method for updating the parcel and accountable activity cost pools for city carriers to account for growing parcel volumes. This update was accomplished by using more recent data.[6] Under current circumstances, changes in the relative volumes of

[6] *See*, Order No. 4259, Postal Regulatory Commission, December 1, 2017.

letter and flat mail also create the need for a process of updating the regular delivery activity cost pools for city carriers.

B. Calculating Updated Regular Delivery Variabilities

The regular delivery time equation specifies that letter/flat street delivery time is a function of DPS mail, cased mail, FSS mail, sequenced mail, collected mail, delivery points and delivery characteristics. There is a separate parcel/accountable delivery equation that accounts for that type of delivery time. The form of the regular delivery equation in the established methodology is:[7]

$$DT = \alpha_0 + \alpha_1 D_{FSS} + \beta_1 DPS + \beta_2 DPS^2 + \beta_3 CM + \beta_4 CM^2 + \beta_5 SEQ + \beta_6 SEQ^2 + \beta_7 FSS + \beta_8 COL + \beta_9 COL^2 + \beta_{10} PD + \beta_{11} PD^2 + \beta_{12} DPS * CM + \beta_{13} DPS * COL + \beta_{14} DPS * PD + \beta_{15} CM * COL + \beta_{16} CM * PD + \beta_{17} FSS * COL + \beta_{18} FSS * PD + \beta_{19} COL * PD + \sum_{i=1}^{3} \left(\delta_i CV_i + \delta_{ii} CV_i^2 \right).$$

In this equation, DT is regular delivery time, D_{FSS} is a dummy variable for FSS sites, DPS is the volume of DPS mail, CM is the volume of cased mail, SEQ is the volume of sequenced mail, FSS is the volume of FSS mail, COL is the volume of mail collected from customers' receptacles, PD is the number of delivery points in the ZIP Code and the CV_i are the characteristic variables.

The regular delivery marginal times and variabilities are calculated using the estimated coefficients from this model. The marginal times are found by taking the

[7] *See*, City Carrier Street Time Report, Docket No. RM2015-7, at 74

derivatives of the equation with respect to the volumes and evaluating them at the mean values:

$$MT_{DPS} = \frac{\partial DT}{\partial DPS} = \beta_1 + 2\beta_2\overline{DPS} + \beta_{12}\overline{CM} + \beta_{13}\overline{COL} + \beta_{14}\overline{PD}.$$

$$MT_{CM} = \frac{\partial DT}{\partial CM} = \beta_3 + 2\beta_4\overline{CM} + \beta_{12}\overline{DPS} + \beta_{15}\overline{COL} + \beta_{16}\overline{PD}.$$

$$MT_{SEQ} = \frac{\partial DT}{\partial SEQ} = \beta_5 + 2\beta_6\overline{SEQ.}$$

$$MT_{FSS} = \frac{\partial DT}{\partial FSS} = \beta_7 + \beta_{17}\overline{COL} + \beta_{18}\overline{PD}.$$

The variabilities are found by multiplying each of the marginal times by the relevant mean volume from the CCSTS sample, and then dividing by the total regular delivery time calculated from the equation, $\widehat{DT}$:

$$\varepsilon_{DPS} = MT_{DPS}\left(\frac{\overline{DPS_s}}{\widehat{DT}}\right).$$

$$\varepsilon_{CM} = MT_{CM}\left(\frac{\overline{CM_s}}{\widehat{DT}}\right).$$

$$\varepsilon_{SEQ} = MT_{SEQ}\left(\frac{\overline{SEQ_s}}{\widehat{DT}}\right).$$

$$\varepsilon_{FSS} = MT_{FSS}\left(\frac{\overline{FSS_s}}{\widehat{DT}}\right).$$

The activity cost pools are then found by multiplying these regular delivery time variabilities by total accrued regular delivery time. For example, for FY 2019, the FSS activity cost pool (ACP_{FSS}) is formed by multiplying the FSS variability (ε_{FSS}) times the accrued letter/flat delivery time cost (DT_{2019}):

$$ACP_{FSS,2019} = DT_{2019} * \varepsilon_{FSS}.$$

The above formulation demonstrates that each street time variability has three parts: the marginal time for the type of mail, the volume for the type of mail, and the total regular delivery time. When volume changes, any of the three parts can change, depending upon the specification of the delivery time equation. Thus, in updating the variability, we follow an approach that allows for responses in all three parts due to a volume change.

Ideally, when volumes change materially, the variability equation would be re-estimated to account for any possible changes in the coefficients that determine the variability. But such an estimation exercise is complex and time-consuming, and such an estimation effort is currently under active consideration in Docket No. PI2017-1. In the meantime, the accuracy of unit volume variable costs can be improved by adjusting the variabilities to reflect current relative volume proportions.[8] Moreover, even after a

[8] The estimation effort being pursued by the Postal Service and the Commission in Docket No. PI2017-1 focuses on estimating a unified variability equation that includes both regular delivery time and parcel/accountable delivery time. That being the case, it would be an inefficient use of scarce resources to mount an effort to estimate just a regular delivery time variability equation.

new city carrier street time variability equation is estimated and approved, this methodology could be used to update those variabilities for future volume changes.

The mean volumes used to calculate the regular delivery time elasticities are typically calculated directly from the study data set. But to facilitate an update of the calculated variabilities, one can also derive the mean volumes as proportions of the total average letter and flat delivered volume. The letter and flat delivered volume is the sum of the four shapes for which delivery variabilities are calculated, as indicated in the next equation. The "s" subscript signifies that the volumes are from the CCSTS data set:

$$LFVOL_S = DPS_S + CM_S + FSS_s + SEQ_s$$

Given this formulation, the average volume for any component of the total can be calculated by multiplying the component's proportion of total letter and flat delivery volume by the overall average volume:

$$\overline{FSS} = \left(\frac{FSS_S}{LFVOL_s}\right)\overline{LFVOL_s}$$

This version of the mean formulation makes it easy to update the regular delivery time variabilities using more recent volume means. The recent mean values are calculated by forming the needed volume proportions with the more recent data, here the FY 2019 CCCS volumes.[9]

$$\widetilde{FSS} = \left(\frac{FSS_{FY19}}{LFVOL_{FY19}}\right)\overline{LFVOL}_{s.}$$

9 The regular delivery time equation also includes volumes collected from customer's receptacles. Data on this type of volume is not included in any of the Postal Service's operational databases, and was obtained through a field study for the City Carrier Street Time Study. Because there are no recent data on volumes collected from customer receptacles, it is not possible to update this volume mean.

One advantage of this approach is that it keeps the total letter and flat volumes the same and only changes the relative proportions, to reflect current volume patterns. This preserves the relevance of the letter and flat volumes for evaluating the regular delivery time equation and calculating the resulting variabilities. In other words, the equation is not being evaluated at a different total volume level than the one used to estimate it. Table 3 presents the volume means using the CCSTS study data and the more recent FY 2019 CCCS data.[10]

Table 3

City Carrier Street Time Study and CCCS Based Means
for Letter and Flat Delivered Mail

Variable	Study Means	CCCS FY19 Based Means
DPS	30,599.60	33,210.30
Cased	9,442.80	9,411.50
Sequenced	4,897.70	3,131.60
FSS	2,138.40	1,325.10
Total	47,078.50	47,078.50

The DPS mean volume based upon the FY 2019 data is 8.5 percent larger than the DPS mean based upon the CCSTS data. The cased mean volume stays about the same. The sequenced and FSS mean volumes are both materially smaller based upon the FY 2019 data. The sequenced mail mean decreases by 36 percent and the FSS

[10] The calculation of the FY2019-based means is presented in Calculating Means Based upon FY 2019 Data.xlsx in USPS-RM2020-7-1.

mean decreases by 38 percent. These differences in mean volumes suggest that a recalculation of the variabilities is warranted.

Once calculated, the CCCS FY2019 based means can be used to update the marginal times and variabilities. For example, for DPS volume, the new marginal time and variability will be given by:

$$\widetilde{MT}_{DPS} = \frac{\partial DT}{\partial DPS} = \beta_1 + 2\beta_2 \widetilde{DPS} + \beta_{12} \widetilde{CM} + \beta_{13} \overline{COL} + \beta_{14} \overline{PD}.$$

$$\varepsilon_{DPS} = \widetilde{MT}_{DPS} \left(\frac{\widetilde{DPS}}{\widetilde{DT}} \right).$$

The tildes on the delivery volume variables indicates that the means were calculated using the FY2019 relative volumes, and the tilde on DT indicates that it was calculated using the FY 2019-based delivery volume means in the established regular delivery time equation. Table 4 presents the new marginal times based upon the FY 2019 data, along with existing marginal times based upon the City Carrier Street Time Study volumes.[11]

[11] The marginal times and associated variabilities are calculated Calculate Variabilities With New Volume Proportions.sas in USPS-RM2020-7-1.

Table 4

Marginal Times (in Seconds) for Delivery Variables

Shape	Study Volumes	FY 2019 Volumes	Difference
DPS	2.07	1.94	-0.13
Cased	2.79	2.98	0.18
Sequenced	2.61	2.87	0.26
FSS	5.21	5.21	0.00

The second order term for DPS volume in the regular delivery time equation is negative, indicating the presence of economies of density. The increase in the mean value for DPS volume thus reduces the DPS marginal time. A similar effect happens for the sequenced mail marginal time, although in the opposite direction. The second order term for sequenced volume is also negative in the regular delivery time equation, but sequenced mail experiences a decline in its mean value. The loss of economies of density pushes up the sequenced marginal time.

Table 4 also shows that the FSS marginal time does not change. This is because it enters the regular delivery time equation linearly, as its second order term is zero. A change in its mean volume thus does not affect its marginal time. Finally, the cased mail marginal time increases despite a modest decline in its average volume. This result occurs because cased mail has a positive cross product term with DPS mail in the regular delivery equation. The modest increase in the cased mail marginal time due to a slight reduction in economies of density is augmented through that cross product by the larger DPS mean volume.

The associated variabilities are easily calculated from the marginal times. Each marginal time is multiplied by the relevant volume mean and then divided by the total regular delivery time, as described above. Table 5 presents the new variabilities based upon the FY 2019 data, along with the old variabilities based upon the City Carrier Street Time Study volumes.

Table 5
Variabilities for Regular Delivery Variables

Shape	**Study Volumes**	**FY 2019 Volumes**	**Difference**
DPS	16.8%	17.2%	0.5%
Cased	7.0%	7.5%	0.5%
Sequenced	3.4%	2.4%	-1.0%
FSS	3.0%	1.9%	-1.1%

Comparison of the marginal times and the variabilities reveals the relative importance of the different responses to changes in volume in determining the new variabilities. For example, the DPS variability increases despite a decline in its marginal time. Recall that the formula for the DPS variability contains three main parts, the marginal time, the mean volume and the overall delivery time at the updated mean volumes:

$$\varepsilon_{DPS} = \widetilde{MT}_{DPS}\left(\frac{\widetilde{DPS}}{\widetilde{DT}}\right).$$

An increase in the relative volume for DPS mail reduces the marginal time, as described above. But this is offset by the positive impact of a higher mean volume on the variability. Because the variability measures the percentage change in time (and thus cost) with respect to a percentage change in volume, a larger volume will imply a larger variability. At a higher volume, a given percentage increase in volume translates into a larger absolute increase in volume, and thus a larger increase in cost. For DPS mail, the positive impact of higher volume on the variability is larger than the negative impact of the lower marginal time, and the variability increases. Because only relative letter and flat delivery volumes are changing in this update, the impact of the volume shifts on total regular delivery times is quite small. The daily ZIP Code day delivery time falls by just one percent from 104.8 hours to 103.7 hours.

The same pattern of effects holds, in reverse, for sequenced mail. The direct impact of the volume decline on the variability is larger than the indirect effect through a higher marginal time, and the variability falls. Because the FSS marginal time is not affected by the volume change, the reduction in relative FSS volume causes a decline in the FSS variability.[12]

C. The Impacts of the Updated Variabilities.

The impetus for this research was the fact the unit city carrier street time flats costs were greatly different for FSS flats and cased flats. The gap between the delivery

[12] Although the mean volume collected from customers' receptacles was not updated, the collections variability did change, because of cross products with DPS mail, cased mail and FSS mail. The formula for the collections variability is given by:

$$\varepsilon_{COL} = \left(\beta_8 + 2\beta_9\overline{COL} + \beta_{13}\widetilde{DPS} + \beta_{15}\widetilde{CM} + \beta_{17}\widetilde{FSS} + \beta_{19}\overline{PD}\right)\frac{\overline{COL}}{\widetilde{DT}}.$$

The increase in the mean volume for DPS mail, along with the declines in the mean volumes for cased mail and FSS mail reduce the collections variability from 5.41 percent to 4.56 percent.

time costs for the two types of flats arose because their relative volume variable costs did not come close to matching their relative volumes. The mismatch occurred because the delivery variabilities were not adjusted to account for the change in relative volumes. To see if recalculating the variabilities to reflect current volumes does indeed mitigate the gap, one can compare the FSS and cased mail flats volume variable delivery time costs for FY 2019 using the old variabilities and the same FY 2019 costs using the new variabilities. This is comparison is done in Table 6.[13]

Table 6

FY 2019 Volume Variable Delivery Time Costs ($000)

	Cased Mail		**FSS Mail**	
	Original	Based on FY19 Variabilities	Original	Based on FY19 Variabilities
Periodicals Flats	$84,957	$91,144	$54,312	$34,008
BPM Flats	$5,733	$6,152	$2,175	$1,362
USPS Marketing Mail Flats	$71,550	$76,779	$47,152	$29,525
Carrier Route Flats	$126,542	$135,790	$100,694	$63,051

The use of current volumes to calculate the variabilities slightly increases city carrier cased flats street costs and materially reduces city carrier FSS flats street costs. This is true for all four products. This change in costs will have the impact of bringing the FSS and cased flats city carrier street time unit costs closer together. Using the

[13] The volume variable delivery time costs using the new variabilities based upon the FY 2019 volumes are calculated in FSSDeliveryModel19.New.xlsx, which is in USPS-RM2020-7-1.

variabilities based upon the FY19 volume proportions reduces the volume variable street time costs for FSS flats by 37.4 percent. The new variabilities cause the volume variable street time costs for cased mail flats to rise by 7.3 percent. Moreover, a small part of in-office costs partly depends upon the street time variabilities. Thus, the new variabilities will also cause a small decrease in in-office volume variable cost for FSS mail and a small increase in volume variable in-office cost for cased mail.

Table 7 presents the reduction, produced by updating the variabilities, in the gap between the unit city carrier costs for FSS flats and the same cost for cased flats.[14]

Using the variabilities based upon the FY19 volume proportions reduces the FSS Periodicals unit street time cost to about 7 cents and slightly increases non-FSS Periodicals unit street cost to 3.4 cents. The gap between FSS and non-FSS Periodicals unit city carrier street time cost is, as a result, reduced from 7.5 cents to 3.7 cents. The remaining gap is far more reasonable and primarily reflects the differences in marginal times for the two types of Periodicals flats. Similar results hold for the other products, as their unit street time cost gaps are also reduced. For Bound Printed Matter Flats, the gap between FSS unit street time costs and non-FSS unit street time costs falls by 2.5 cents. For Marketing Mail Flats, that gap falls by 4 cents, and for Carrier Route flats, the gap falls by 3.8 cents.

[14] These unit costs are also calculated in FSSDeliveryModel19.New.xlsx.

Table 7
Carrier Unit Flats Costs

Based on CCSTS Volumes

Destinating FSS Zones

Class, Shape, or Rate Category	City In-Office	City Street	City Total	City Plus Rural
Periodicals Flats	0.032	0.107	0.139	0.155
Bound Printed Matter Flats	0.040	0.076	0.117	0.131
USPS Marketing Mail Flats	0.058	0.110	0.169	0.185
Carrier Route Flats	0.032	0.107	0.139	0.156

Destinating Non-FSS Zones

Class, Shape, or Rate Category	City In-Office	City Street	City Total	City Plus Rural
Periodicals Flats	0.071	0.032	0.102	0.152
Bound Printed Matter Flats	0.098	0.045	0.143	0.185
USPS Marketing Mail Flats	0.141	0.033	0.174	0.218
Carrier Route Flats	0.075	0.038	0.113	0.161

Based on FY 2019 Volumes

Destinating FSS Zones

Class, Shape, or Rate Category	City In-Office	City Street	City Total	City Plus Rural
Periodicals Flats	0.030	0.071	0.102	0.118
Bound Printed Matter Flats	0.039	0.054	0.093	0.107
USPS Marketing Mail Flats	0.056	0.073	0.129	0.146
Carrier Route Flats	0.030	0.071	0.101	0.118

Destinating Non-FSS Zones

Class, Shape, or Rate Category	City In-Office	City Street	City Total	City Plus Rural
Periodicals Flats	0.071	0.034	0.105	0.155
Bound Printed Matter Flats	0.098	0.048	0.146	0.188
USPS Marketing Mail Flats	0.142	0.035	0.176	0.220
Carrier Route Flats	0.075	0.040	0.115	0.163

The use of the FY 2019 volumes to calculate the variabilities leads to changes to some degree in the volume variable city carrier costs for nearly all products.[15] For most

[15] The new unit volume variable city carrier costs are calculated in Calculate Unit Carrier Cost with New Variabilities.xlsx in USPS-RM2020-7 -1. The results for individual

products, the changes will be very small, just a fraction of a cent, but for directly affected products, the changes will be larger. For High Density and Saturation Flats and Parcels, the unit city carrier cost, including both office time and street time, as well as related indirect costs, falls by 1.2 cents. This cost decline is material because the current city carrier unit cost for High Density and Saturation Flats and Parcels is 6.7 cents.

This smaller unit smaller cost arises because 63 percent of High Density and Saturation Flats are sequenced, and another 4.8 percent are sorted on the FSS. Both of those types of mail experienced declines in their associated variabilities due to the volume adjustment. The associated declines in volume variable costs caused the decline in unit cost. First-Class Presort Letters and Presort Cards unit costs rise slightly (by $0.001) because of the higher DPS variability, and First-Class Single-Piece Letters and Cards costs fall slightly (by $0.005) because of lower collection costs. Periodicals unit cost falls by half a cent due to the lower FSS variability. The lower FSS variability also reduces Carrier Route unit costs.

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competitive products are presented under seal in the non-public folder entitled USPS-RM2020-7-NP1.

Table 8

City Carrier Unit Costs Including Indirect Costs

Product	CCSTS Volumes	FY 2019 Volumes	DIFFERENCE
First-Class Mail			
Single-Piece Letters	$0.099	$0.094	-$0.005
Single-Piece Cards	$0.118	$0.113	-$0.005
Presort Letters	$0.040	$0.041	$0.001
Presort Cards	$0.035	$0.035	$0.001
Single-Piece Flats	$0.229	$0.222	-$0.008
Presort Flats	$0.180	$0.177	-$0.003
USPS Marketing Mail			
High Density and Saturation Letters	$0.042	$0.041	-$0.001
High Density and Saturation Flats/Parcels	$0.067	$0.055	-$0.012
Every Door Direct Mail-Retail	$0.059	$0.049	-$0.009
Carrier Route	$0.120	$0.113	-$0.007
Letters	$0.041	$0.041	$0.001
Flats	$0.174	$0.168	-$0.005
Parcels	$0.385	$0.383	-$0.001
Periodicals	$0.109	$0.104	-$0.005
Package Services			
Bound Printed Matter Flats	$0.138	$0.136	-$0.003
Bound Printed Matter Parcels	$0.271	$0.271	$0.000
Media/Library Mail	$0.321	$0.318	-$0.004
US Postal Service	$0.164	$0.166	$0.002
Free Mail	$0.142	$0.143	$0.000
Total Domestic Competitive Mail and Services	$0.363	$0.361	-$0.002
Total International Mail And Services	$1.024	$1.025	$0.000